

REMARKS

Applicant wishes to thank the Examiner for the attention accorded to the instant application, and respectfully requests reconsideration of the application as amended.

Formal Matters

Claims 1, 2, 5, 6, 9-16 are pending in the application and claims 1, 2, 5, 6, 11 and 12 are amended. In particular, independent claims 1, 2, 5 and 6 are amended to include the limitations of claims 3, 4, 7, and 8, respectively. Claims 3, 4, 7 and 8 are canceled. Claims 11 and 12 are amended to depend from claims 5 and 6, respectively.

Rejection of Claims Under 35 U.S.C. §102

Claims 2, 4, 6, 8, and 10 are rejected under 35 U.S.C. § 102(e) as anticipated by Stekelenburg, U.S. Patent No. 6,727,939. This rejection should be withdrawn based on the comments and remarks herein.

Applicant's claimed invention fulfills the need for a camera module enabling two cameras to be mounted while minimizing mounting area and complexity of wiring, and for a mobile communication terminal using such a camera module. In one embodiment, the present inventive apparatus includes two camera units mounted on the same face of a flexible substrate such that when the flexible substrate is bent, the field of view of one camera unit is the reverse of the field of view of the other camera unit. Another inventive embodiment discloses two camera units mounted on different faces of a flexible substrate. In both embodiments, the lens face of one camera unit is in the same plane as the rear face of the other camera unit.

Stekelenburg discloses a portable television camera with an auxiliary camera that allows a camera operator to view a scene behind and/or next to him (column 1, lines 31-35).

Stekelenburg further discloses a built-in camera module comprising one flexible mechanical

coupling which connects the portable television camera unit and the auxiliary camera so that the directions of their fields of view are reversed to each other (see column 2, lines 7-20). Figure 1b of Stekelenburg shows that the lens face of the TV camera is in front of the user and the auxiliary camera is behind the user. Hence, Stekelenburg does not disclose or suggest that the lens face of the TV camera unit is in a same plane as the rear of the auxiliary camera unit, and does not disclose or suggest a lens face of said first camera unit and a rear face of said second camera unit being on a same first plane and a rear face of said first camera unit and a lens face of said second camera unit being on a same second plane different from the first plane, as recited in independent claims 2 and 6.

It has been held by the courts that “Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim.” *Lindemann Maschinenfabrik GMBH v. American Hoist and Derrick Company et al.*, 730 F.2d 1452, 221 USPQ 481 (Fed. Cir. 1984). As illustrated above, Stekelenburg does not disclose a lens face of said first camera unit and a rear face of said second camera unit being on a same first plane and a rear face of said first camera unit and a lens face of said second camera unit being on a same second plane different from the first plane, so that Stekelenburg does not disclose every feature of the invention as recited in claims 2 and 6. Claim 10 depends from claim 6, incorporating all of the features and limitations of its base claim. Thus claim 10 is not anticipated by the art of record for at least the reasons that its base claim is not anticipated by the art of record. Claims 4 and 8 are canceled. Accordingly, this rejection should be withdrawn.

Rejection of Claims Under 35 U.S.C. §103

Claims 1, 3, 5, 7, 9, 11 and 12 are rejected under 35 U.S.C. § 103(a) as unpatentable over

Stekelenburg, in view of Mizobuchi, U.S. Patent No. 6,160,967. This rejection should be withdrawn based on the comments and remarks herein.

As discussed above, Stekelenburg does not disclose or suggest a lens face of said first camera unit and a rear face of said second camera unit being on a same first plane and a rear face of said first camera unit and a lens face of said second camera unit being on a same second plane different from the first plane as recited in independent claims 1 and 5. Mizobuchi does not overcome this deficiency. Mizobuchi discloses arranging components, such as IC chips and other electronic parts, on a flexible printed circuit board that is bent and mounted within a camera body (column 3, lines 58-59, column 4, lines 1-5). Mizobuchi does not disclose or suggest mounting camera units or faces of camera units on the flexible PCB or on any plane, and does not disclose or suggest “a lens face of said first camera unit and a rear face of said second camera unit being on a same first plane and a rear face of said first camera unit and a lens face of said second camera unit being on a same second plane different from the first plane” as recited in independent claims 1, and 5.

It has been held by the courts that to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. See, *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). As illustrated above, the hypothetical combination of Stekelburg and Mizobuchi does not disclose or suggest a lens face of said first camera unit and a rear face of said second camera unit being on a same first plane and a rear face of said first camera unit and a lens face of said second camera unit being on a same second plane different from the first plane, and does not disclose or suggest each and every feature of the present invention as recited in the independent claims, so that *prima facie* obviousness has not been established. Thus, claims 1, 5, and 6 are patentably distinguishable over the art of record in the

application. Further, claims 9 and 11 depend from claim 5, and claim 12 depends from claim 6, each dependent claim incorporating all of the features and limitations of its base claim. Thus, the dependent claims are patentable over the art of record in the application for at least the reasons that their base claims are patentable over the art of record. Claims 3 and 7 are canceled. Accordingly, applicant requests that this rejection be withdrawn.

Rejection of Claims 13-16 Under 35 U.S.C. §103

Claims 13-16 are rejected under 35 U.S.C. § 103(a) as unpatentable over Stekelenburg in view of Mizobuchi, as applied to claim 9 above, and further in view of Lee, et al., U.S. Patent Application Publication No. 2004/0212709 (hereinafter "Lee"). This rejection should be withdrawn based on the comments and remarks herein.

As discussed above, the hypothetical combination of Stekelenburg and Mizobuchi does not disclose or suggest all of the features of independent claims 5 and 6. Lee does not cure this deficiency, and the Examiner does not assert otherwise. Thus, *prima facie* obviousness of these claims had not been established. Claims 13 and 15 depend from claim 5, and claims 14 and 16 depend from claim 6, each dependent claim incorporating all of the features and limitations of its base claim. Thus, claims 13-16 are distinguishable over the art of record in the application for at least the reasons that independent claims 5 and 6 are patentably distinguishable over the art of record in the application. Thus, applicant requests that this rejection be withdrawn.

Conclusion

In light of the foregoing, Applicant respectfully submits that all pending claims recite patentable subject matter, and kindly solicits an early and favorable indication of allowability. If

the Examiner has any reservation in allowing the claims, and believes a further telephone interview would advance prosecution, he is kindly requested to telephone the undersigned at his earliest convenience.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Katherine R. Vieyra".

Katherine R. Vieyra
Registration No. 47,155

SCULLY, SCOTT, MURPHY & PRESSER, P.C.
400 Garden City Plaza - Suite 300
Garden City, New York 11530
(516) 742-4343 (telephone)
(516) 742-4366 (facsimile)
KRV:jam